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22 *Attorneys for Plaintiffs*

23 **UNITED STATES DISTRICT COURT**
24
FOR THE DISTRICT OF NEVADA

25 MARIA TSATAS, an individual; LEONIDAS
26 VALKANAS, as trustee of the KEET TRUST
27 dated August 1, 2015; RAYMOND BARAZ,
28 an individual; PASCAL ABDALLAH, an
individual; JIMMY TSOUTSOURAS, an
individual; FOTINI VENETIS, an individual;
NICHOLAS TSOUTSOURAS, an individual;
CONNIE TSOUTSOURAS, an individual;
RAYMONDE KANHA, an individual;
ALFRED BEKHIT, an individual; JACQUEZ
ELBAZ, an individual; MARTINE
BENEZRA, an individual; JAMES P.
CARROLL, an individual; DAVID CHIN, an
individual; JENNIFER MILLS, an individual;
PAUL SUBLETT, an individual; ANDREW
SUBLETT, an individual; MANOLIS
KOSTAKIS, an individual; ESTHER
GEORGAKOPOULOS, an individual;
EVAGELIA KOSTAKIS, an individual;
DENIS PARSONS, an individual; SOFIA
KARDARAS, an individual; JIMMY
ASMAKLIS, an individual; CORRADINO

29 CASE NO.: 2:20-cv-2045-RFB-BNW

30 **STIPULATION TO EXTEND TIME TO**
31 **FILE RESPONSES AND REPLY BRIEFS**
32 **TO DEFENDANTS' MOTION FOR CASE**
33 **DISPOSITIVE SANCTIONS (ECF NO. 242)**
34 **BY 7 DAYS**

35 **(First Request)**

1 GALUPPO, an individual; DENIS KOPITAS,
2 an individual; TERRY TSATAS, an individual;
3 GEORGE TSATAS, an individual;
4 PANAGIOTA TSATAS, an individual;
5 OURANIA TSATAS, an individual;
6 KIRIAKOS PRIMBAS, an individual;
7 EVANTHIA PRIMBAS, an individual;
8 PATRICK AYOUB, an individual; MICHAEL
9 BESCEC, an individual; ERNEST LEBOEUF,
an individual; PHILIPPE LEGAULT, an
individual; EFTIHIOS LITSAKIS, an
individual; GIOVANNI MONCADA, an
individual; MARC RIEL, an individual;
JARADEH SALIM, an individual; HANI
HAMAM, an individual; CONSTANTIN
ZISSIS, an individual; BESSIE PEPPAS, an
individual; NIKI PALIOVRAKAS, an
individual,

10 Plaintiffs,

11 v.

12 AIRBORNE WIRELESS NETWORK, INC., a
13 Nevada Corporation; MICHAEL J. WARREN,
14 an individual; J. EDWARD DANIELS, an
individual; MARIUS DE MOS, an individual;
15 JASON DE MOS, an individual; ROBERT
BRUCE HARRIS, an individual; KELLY
KABILAFKAS, an individual; and
APCENTIVE, INC., a Nevada Corporation,

16 Defendants.

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1 **STIPULATED REQUEST FOR EXTENSION OF DEADLINE TO FILE RESPONSE**
 2 **AND REPLY BRIEFS TO ECF NO. 242**

3 Plaintiffs (as listed in the above caption, with the exception of the ten named plaintiffs for
 4 whom the Court granted a Motion to Withdraw (ECF No. 219) and for which there is a pending
 5 unopposed request to dismiss them (ECF No. 236)) and Defendants (as listed in the above caption,
 6 with the exception of the deceased defendant Marius de Mos) (together, the “Parties”), by and
 7 through their undersigned counsel of record, submit this Stipulation to Extend Time to File
 8 Responses and Replies pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1.

9 WHEREAS, on March 7, 2024, Defendants filed a Motion for Case Dispositive Sanctions
 10 for Perjury and Other Misconduct Against All Plaintiffs, or in the Alternative Against Plaintiff
 11 Leonidas Valkanas, as Trustee of the Keet Trust (ECF No. 242).

12 WHEREAS, Plaintiffs’ Response to Defendants’ Motion for Case Dispositive Sanctions is
 13 currently due on March 21, 2024 and Defendants’ Reply Brief is currently due on March 28, 2024.

14 WHEREAS, the Parties have met and conferred about material that was filed in the
 15 Declaration of Peter L. Chasey, Esq. (ECF No. 242-1) that Plaintiffs designated as
 16 “CONFIDENTIAL” pursuant to the August 9, 2021 Stipulated Protective Order and
 17 Confidentiality Agreement (ECF No. 64).

18 WHEREAS, on March 14, 2024, the Parties reached a stipulation to strike (ECF No. 245)
 19 the Declaration of Peter L. Chasey, Esq. (ECF No. 242-1) and replace it with the Amended
 20 Declaration of Peter L. Chasey, Esq. (ECF No. 243-1), filed on March 13, 2024 and which redacted
 21 the information Plaintiffs designated as “CONFIDENTIAL.”

22 WHEREAS, the meet and confer process regarding the “CONFIDENTIAL” material took
 23 time away from Plaintiffs’ ability to oppose Defendants’ Motion (ECF No. 242) on the merits.

24 WHEREAS, the Parties agreed that Plaintiffs could have an additional week to respond to
 25 Defendants’ Motion (ECF No. 242), without prejudice to requesting an additional week, if needed.

26 WHEREAS, this is the Parties’ first request for an extension of the deadlines to file a
 27 Response and Reply Brief to Defendants’ Motion (ECF No. 242).

28 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by

1 and through their respective attorneys of record, that, for good cause, the deadlines to file a
 2 Response and Reply Brief to Defendants' Motion (ECF No. 242) is extended by one week as
 3 follows:

4	Current deadline to file Response to Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	March 21, 2024
7	New deadline to file Response to Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	March 28, 2024
10	Current deadline to file Replies re Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	March 28, 2024
13	New deadline to file Replies re Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	April 4, 2024

17 **IT IS SO STIPULATED.**

19 DATED: March 15, 2024

20 Respectfully submitted.

21 VC2 LAW
22 NOVIAN & NOVIAN, LLP

24 By: /s/ Andrew B. Goodman

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5 *Attorneys for Plaintiffs*

6 DATED: March 15, 2024
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9
10 Respectfully submitted.
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13 CHASEY LAW OFFICES
14 LAW OFFICES OF S. DON BENNION
15
16

17 By: /s/ Peter Chasey
18 PETER L. CHASEY, ESQ. #7650
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22

23 S. Don Bennion, Esq. #4530
24 6980 O'Bannon Drive, Suite 400
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26
27

28 *Attorneys for Defendants*

29 IT IS SO ORDERED:
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32 
33 Sherk Weikel
34 UNITED STATES MAGISTRATE JUDGE
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37 DATED: 3/18/2024
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CERTIFICATE OF SERVICE

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On March 15, 2024, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

1	Peter L. Chasey, Esq. Chasey Law Offices 3295 N. Fort Apache Road, Suite 110 Las Vegas, Nevada 89129 Email: peter@chaseylaw.com	<input type="checkbox"/> Via Hand Delivery <input checked="" type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via CM/ECF
4	S. Don Bennion, Esq. Law Offices of S. Don Bennion 6980 O'Bannon Drive, Suite 400 Las Vegas, NV 89117 Email: don@bennionlaw.com	
7	Sofia Kardaras Email: sophiakard@gmail.com	
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10	Michael Bescec Email: mbescec@outlook.com	
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15	Eftihios Listakis Email: information@constructionleandre.com	
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18	Giovanni Moncada 204 Ivy Jay Crescent Aurora, Ontario, Canada L4G-0E9	
20	Jaradeh Salim 11515 Rue LaForest Montreal, Quebec, Canada H3M2W5	
22	Hani Hamam 7550 Querbes Ave. Montreal, Quebec, Canada H3N 2B6	
24	Marius de Mos Email: wind-power@msn.com	

26
27 DATED March 15, 2024.

28 /s/ Amanda McGill

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